

III. REMARKS

Claims 1-20 are pending in this action. By this Amendment, claims 5, 12 and 17 have been amended. Reconsideration in view of the above amendments and the following remarks is respectfully requested.

In the Office Action, claims 5, 12 and 17 are objected to because of an alleged informality. By this Amendment, claims 5, 12 and 17 have been revised accordingly. Applicants respectfully request withdrawal of the objection.

In the Office Action, claims 1-7, 9-12 and 14-19 are rejected under 35 U.S.C. 102(e) as allegedly being anticipated by Poechmueller (US Pub. No. 2005/0060672); and claims 8, 13 and 20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Poechmueller in view of Heng et al., *A VLSI Artwork Legalization Technique Based on a New Criterion of Minimum Layout Perturbation*, Proceedings of the 1997 International Symposium on Physical Design, PP. 116-121. Applicants respectfully traverse these rejections for the reasons that follow.

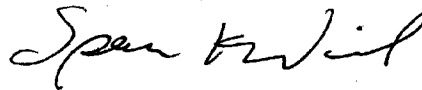
With respect to independent claims 1, 10 and 15, the claimed invention includes, *inter alia*, “calculating a scaling factor based on a ratio of the minimum legal size divided by a pre-compaction size; and scaling the circuit design using the scaling factor while maintaining an objective.” (Claim 1; similarly claimed in claims 10 and 15). Poechmueller does not include “a ratio of the minimum legal size divided by a pre-compaction size[.]” Rather, Poechmueller only discloses increasing a target spacing and decreasing a predecessor/successor spacing by an “incremental spacing” of an absolute amount, e.g., 10nm. (¶ 0041; *see also* FIG. 3.) Poechmueller does not include calculating a scaling factor based on a ratio and does not include scaling a circuit design using the scaling factor.

In addition, Poechmueller only discloses “de-compacting a layout” (abstract), not “minimizing area of a circuit design ratio” (claim1 of the claimed invention). As such, Poechmueller does not include “a pre-compaction size[.]” (Claim 1).

In view of the foregoing, Poechmueller does not anticipate the claimed invention. Accordingly, Applicants respectfully request withdrawal of the rejection. The dependent claims are believed allowable for the same reasons stated above, as well as for their own additional features.

Applicants respectfully submit that the application is in condition for allowance. Should the Examiner believe that anything further is necessary to place the application in better condition for allowance, the Examiner is requested to contact Applicants’ undersigned attorney at the telephone number listed below.

Respectfully submitted,



Spencer K. Warnick
Reg. No. 40,398

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Hoffman, Warnick & D’Alessandro LLC
75 State Street, 14th Floor
Albany, New York 12207
(518) 449-0044
(518) 449-0047 (fax)